

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

QUICKEN LOANS,

Case No. 2:11- cv-11567

Plaintiff,

Hon. Marianne O. Battani

v.

Magistrate Judge: Laurie J. Michelson

EPIC MEDIA GROUP, INC. a Delaware Corporation, f/k/a AZOOGLE.COM, INC., a Delaware Corporation and AZOOGLEADS US, INC. a Delaware Corporation, both d/b/a/ AZOOGLEADS.COM, INC., jointly and severally,

Defendants.

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DEFENDANT'S MOTION TO EXTEND DISPOSITIVE MOTION DEADLINE

Defendant Epic Media Group, Inc., ("Defendant") by and through its attorneys, hereby requests an extension of the dispositive motion deadline set forth in this case. In support of this motion, Defendant states:

1. On May 24, 2012, the Court granted Defendant's first Motion to Extend Dispositive Motion Cutoff and Motion to Extend Scheduling Order Dates (the "Order"). (Doc. # 46).
2. Pursuant to the Order, discovery is to be completed by July 30, 2012 and dispositive motions are to be filed by August 10, 2012.
3. The Order further directed the parties to complete facilitation by July 30, 2012.
4. Due to the conflicting schedules of the facilitator, the parties' representatives and their counsels, the parties agreed to a facilitation date of August 14, 2012.
5. Notwithstanding the Court's original deadline, the Court approved the August 14, 2012 date.
6. Given that the facilitations date is four days after the August 10, 2012 dispositive motion cutoff date, Defendant requests that the dispositive motion date be extended to September 14, 2012.
7. Extending the dispositive motion date will benefit the parties by saving the substantial time and expense of preparing summary judgment motions, especially should the parties reach a resolution on the matter through facilitation.
8. In accordance with LR 7.1(a), on July 9, 10, and 11, 2012, Defendant's counsel exchanged emails with Plaintiff's counsel to discuss the requested extensions, but Plaintiff's counsel would not agree with the content of a stipulated order.

WHEREFORE, Defendant respectfully requests that the Court grant Defendant's Motion to Extend Dispositive Motion Deadline.

Dated: July 12, 2012

/s/ Daniel J. Ammon

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**MEMORANDUM IN SUPPORT OF MOTION
TO EXTEND DISPOSITIVE MOTION DEADLINE**

In support of the Motion to Extend Dispositive Motion Deadline, Defendant relies on Fed. R. Civ. Procedure 6(b) and 16(b)(4), and on the record in the instant matter.

Dated: July 12, 2012

/s/ Daniel J. Ammon

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on July 12, 2012 I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Jeffrey B. Morganroth, Esq.

and I hereby certify that I have mailed by United States Postal Service the paper to the following non ECF participants:

N/A

Dated: July 12, 2012

/s/ Daniel J. Ammon

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